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April 23, 2025

VIA ECF

The Honorable Gregory H. Woods  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

Re: *Reca v. Flashdot Limited f/k/a PhoenixFin Limited, et al.*,  
Civil Action No. 1:24-cv-06316-GHW-SLC

Dear Judge Woods:

We represent plaintiffs Sofia Reca and James K. Supples (“Plaintiffs”) in the above-referenced action. On April 14, 2025, Plaintiffs filed an amended complaint (ECF No. 49, the “AC”) and added a new corporate defendant, Chainalysis, Inc. (“Chainalysis”), a crypto-tracing analysis company. We write to respectfully request a modification to the schedule for defendants Peken Global Limited, Flashdot Limited f/k/a PhoenixFin Limited, Chun Gan, and Ke Tang (together, the “KuCoin Defendants”) to answer or otherwise respond to the AC, such that the KuCoin Defendants’ motion to dismiss will be on the same schedule as the anticipated motion to dismiss by Chainalysis.

After Plaintiffs filed the AC, Your Honor issued an order on April 14, 2025 (ECF No. 52) denying the KuCoin Defendants’ motion to dismiss the initial complaint (ECF No. 45) as moot, and instructing the KuCoin Defendants to answer or otherwise respond to the AC by May 5, 2025. *See* ECF No. 52. Plaintiffs properly served defendant Chainalysis on April 16, 2025, and promptly filed proof of service on April 22, 2025. *See* ECF No. 54. Pursuant Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure and ECF No. 54, Chainalysis must answer or otherwise respond to the AC by May 7, 2025 (within 21 days after service). Although counsel for Chainalysis has not yet appeared, the parties anticipate that counsel for the KuCoin Defendants will not represent Chainalysis.

If the KuCoin Defendants’ motion to dismiss proceeds in accordance with the current schedule, there will be separate briefing schedules for the motion to dismiss filed by the KuCoin Defendants and any motion to dismiss filed by Chainalysis, even though many of the arguments and issues may overlap. Plaintiffs respectfully submit that coordinating the briefing schedules for the anticipated motions to dismiss by the KuCoin Defendants and Chainalysis will promote judicial economy, mitigate unnecessary briefing, promote an orderly process for the litigation, and conserve judicial (as well as the parties’) resources. *See Readick v. Avis Budget Grp., Inc.*, 2014 WL 1683799, at \*6 (S.D.N.Y. Apr. 28, 2014) (“[C]onsiderations of judicial economy are frequently viewed as relevant to the public interest, and, as noted, they weigh against the investment of court resources that may prove to have been unnecessary.”). Accordingly, Plaintiffs respectfully request that the Court

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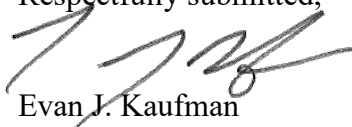
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adopt the following schedule, which should afford Chainalysis sufficient time to retain counsel and respond to the AC:

<b>Event</b>	<b>Date</b>
The KuCoin Defendants' and Chainalysis' Motion(s) to Dismiss the AC	May 29, 2025
Plaintiffs' Opposition(s) to the KuCoin Defendants' and Chainalysis' Motion(s) to Dismiss	June 30, 2025
The KuCoin Defendants' and Chainalysis' Reply/Replies	July 17, 2025

Plaintiffs have conferred with counsel for the KuCoin Defendants and they consent to the relief sought herein, including coordinating the briefing schedule and the proposed dates. Plaintiffs and the KuCoin Defendants are also available for a conference at the Court's convenience to discuss this request. This is Plaintiffs' first request for adjournment or extension of time for the filing of defendants' motion(s) to dismiss the AC.

Respectfully submitted,



Evan J. Kaufman

cc: All Counsel of Record (via ECF)